

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Stuart David Seiberling
Debtor 1
Nicole Lyn Seiberling
Debtor 2

Chapter 13

Case No. 1:17-BK-05067-HWV

Matter: Motion for Termination of Wage Attachment Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Stuart David Seiberling and Nicole Lyn Seiberling, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about December 8, 2017.
- 2) Debtor 1 receives regular income from employment with Turkey Hill Dairy which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: March 10, 2022

/s/ Stuart David Seiberling

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Stuart David Seiberling
Debtor 1

Nicole Lyn Seiberling
Debtor 2

Chapter 13

Case No. 1:17-BK-05067-HWV

Matter: Motion for Termination of Wage Attachment Order

ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should immediately cease the wage attachment in the amount of **\$17.31** from each **weekly** paycheck.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Stuart David Seiberling
Debtor 1
Nicole Lyn Seiberling
Debtor 2

Chapter 13

Case No. 1:17-BK-05067-HWV

Matter: Motion for Termination of Wage Attachment Order

CERTIFICATE OF SERVICE

I hereby certify that on Thursday, March 10, 2022, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Turkey Hill Dairy
Attn: Payroll Department
2601 River Road
Conestoga, PA 17516

Via Electronic Means
Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire